



O'BRIEN & GERE
ENGINEERS, INC.

EPA Region 5 Records Ctr.



301323

October 13, 2003

Mr. Kevin Turner
On-Scene Coordinator
U.S. EPA, Region 5
8588 Rt. 148
Marion, IL 62959

Via Certified Mail

Re: RRG/Clayton Chemical Site, Sauget,
Illinois - Docket No. V-W-'03-C-720
MONTHLY PROGRESS REPORT-
September 03

File: 11331/31861 #2

Dear Mr. Turner:

On behalf of the Performing Members, RRG Clayton Chemical Site Liquids Group (The Group) and in accordance with the October 11, 2002 Administrative Order by Consent and the January 14, 2003 Work Plan approval, we are submitting this progress report for the month of September, 2003.

1. WORK PERFORMED & PROBLEMS ENCOUNTERED DURING SEPTEMBER, 2003

- Clean Harbors re-mobilized to site on September 2, 2003.
- Repaired leak at tank S-2 by installing a blind flange.
- Began liquids removal in tank G-2 – hydrogen sulfide discovered in loads removed from G-2 and other tanks; therefore, developed a plan to safely remove, transport, and dispose liquids from these tanks.
- Collected additional characterization samples from several tanks for analyses.
- Completed and approved several waste profiles for liquid material in tanks (oil/water and blended fuels) and began removal, transport and disposal.
- Cleaned several empty tanks.
- Completed drum sampling.
- Identified elevated levels of total halogens in some oils – discussed disposal options with Group and USEPA for oil containing total halogens and associated water.
- Obtained a Missouri Generator ID# which was required to transport wastes into that State.
- Because the Holcim facility in Clarksville, MO bought out Safety Kleen and changed name to Energis, performed due diligence on Energis.
- "Crude oil" in tank G-4 was not accepted for fuel blending due to high viscosity; alternatives are under consideration.
- Clean Harbors identified Robbie D. Wood as an alternate waste hauler due to local trucking firm, Schiber not being able to dedicate enough trucks. Notified USEPA of change in trucking subcontractor.
- Increased the number of trucks hauling LHS from two to five starting on September 29, 2003.
- Approximate LHS removed is 22% of anticipated total; time expended is 40% of original schedule.



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i/proj/11331/31861/2_corr/mpr_Sept_03.doc

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2. ANALYTICAL DATA RECEIVED DURING SEPTEMBER, 2003

Received analytical data for liquids in tanks A-1, B-1, B-2, B-4, G-2, G-4, G-5, G-6, G-7, G-8, G-9, G-10, 2, 11, 12, 13, and 14.


3. WORK ANTICIPATED NEXT MONTH

- Continue liquids removal
- Continue waste analysis and profiling
- Clean tanks after liquids removed
- Remove drums

Please contact me at 248.661.3745, ext. 13 if you have any questions.

Very truly yours,

O'BRIEN & GERE ENGINEERS, INC.



Scott L. Cormier, P.E.
Senior Managing Engineer

cc: Mr. Tom Turner, U.S. EPA Associate Regional Counsel, Chicago, IL
Performing Members – RRG Clayton Chemical Site Liquids Group
O'Brien & Gere Team